



AIR LINE PILOTS ASSOCIATION, INTERNATIONAL

535 HERNDON PARKWAY □ P.O. BOX 1169 EL HERNDON, VIRGINIA 20172-1169 EI 703-689-2270
FAX 703-689-4370

March 3, 2000

US Department of Transportation Dockets
Docket No. FAA-99-6717-57
400 Seventh Street, SW
Room Plaza 401
Washington DC 20590

Dear Sir or Madam:

The Air Line Pilots Association (ALPA) has had an opportunity to review the Disposition of comments document regarding the FAA policy statement for 207-minute ETOPS published in the Federal Register on January 21, 2000. As you are aware ALPA was an active participant in the ATA working group which drafted the proposed policy letter published in the Federal Register on April 27, 1999. ALPA continues to support the extension of ETOPS to 207 minutes on a "case by case" basis with caveats.

In its response to the ATA submission, published in the Federal Register on January 18, 2000, the FAA stated that it accepts "all the proposed added requirements as an integral part of a special 207-minute (ETOPS) authorization, except the monthly reporting requirements". ALPA is disappointed that the FAA does not support the recommendation that an industry group be formed to review, on a continuous basis, the implementation of such a policy. It is noted that such a review is required by the FAA, albeit internal to that organization. ALPA's full support for such a policy, and for continued operations under such authority, is predicated on a strict numerically and operationally limited application. ALPA intends to demand access to the operational data for the purpose of its own timely review of such operations to ensure that the intent of the policy letter is maintained. ALPA's full and continued support will rest with such access and satisfactory review.

In the January 21, 2000 Federal register the FAA states, "The FAA has not made a determination that the proposal by the ATA is the only proposal that would allow all 207 minute ETOPS operations.....". ALPA strongly opposes any effort to extend ETOPS beyond 180 minutes outside the context of this specific and limited policy letter. A basic premise of the ATA submission, and the collaborative effort that ensued, was that there would be no other effort to extend ETOPS outside the context of a full regulatory review and harmonization effort. This proposal was geographically and operationally specific and ALPA's support of ETOPS beyond 180 minutes extends no further than this singular document. The proposed ARAC ETOPS Working Group is the only "next step" in ETOPS that ALPA can and will support.

ALPA must again emphasize that it's support for such a policy is predicated on its limited use and geographic application. Any effort by the industry to expand such operations beyond such a focused scope would be unacceptable to ALPA. Although not a criteria of ALPA's support, it is strongly suggested that such operations not be open-ended. Likewise, as the industry rationalizes ETOPS criteria across all long-range operations under the auspices of the Aviation Rulemaking Advisory Committee (ARAC), the specific case of 207-minute ETOPS should not be considered as a legitimate subset of ETOPS with commensurate grandfather rights.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Bob Reich". The signature is written in a cursive, slightly slanted style.

Captain Robert Reich, Chairman
ALPA ETOPS Project Team 

RR: nsr